

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Sabrina Brown Erkhart
Brett Alvin Erkhart, Debtors**

**Case No. 24-51518-KMS
CHAPTER 13**

NOTICE

The undersigned counsel for Debtors have filed papers with the court to approve attorney's compensation.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Application, or if you want the court to consider your views on the Application, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Dan M. Russell, Jr. United States Courthouse
2012 15th St., Ste. 244
Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the Debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief, which shall sustain this Application for Compensation.

Date: April 21, 2025

Signature: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
PO Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Sabrina Brown Erkhart
Brett Alvin Erkhart, Debtors**

**Case No. 24-51518-KMS
CHAPTER 13**

**SECOND APPLICATION FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF NECESSARY EXPENSES
FOR THOMAS C. ROLLINS, JR.**

COMES NOW, Thomas C. Rollins, Jr., (the “Applicant”) attorney for the Debtors, and files this *Second Application for Allowance of Compensation and Reimbursement of Necessary Expenses for Thomas C. Rollins, Jr.* and in support thereof, would respectfully show to this Honorable Court as follows, to-wit:

1. On October 22, 2024, Debtors filed a bankruptcy petition under Chapter 13 of the bankruptcy code.
2. The Debtors and Thomas C. Rollins, Jr. of The Rollins Law Firm, PLLC (hereinafter “the firm”), have agreed to an hourly billing arrangement in lieu of this Court’s standard “no look” fee award. Per said agreement, attorney T.C. Rollins is billed at a rate of \$360.00 per hour while attorney Jennifer Calvillo is billed at a rate of \$360.00 per hour. Paralegals are billed at a rate of \$155.00 per hour. Legal Assistants bill at \$100.00 per hour. Said rates are reasonable and in keeping with community custom and standards for attorneys in this area. T.C. Rollins and Jennifer Calvillo are both board certified in consumer bankruptcy law by the American Board of Certification.
3. The Debtors herein did not provide a retainer.
4. Throughout our representation of the Debtors herein, our firm has maintained itemized billing entries which are completed and maintained contemporaneously with the associated service(s) provided. The services provided by the firm were reasonable in view of the circumstances of this case.

5. The Court previously approved compensation in the amount of 3,386.66 (Dk #26).
6. The chapter 13 Trustee has disbursed \$2,158.05 on this claims as of April 21, 2025.
7. The time incurred and services provided by the firm since the filing of the previous fee application have resulted in Attorney's fees in the amount of \$1,277.00 and expenses in the amount of \$124.16 for a total of \$1,401.16. A detailed accounting of which is attached hereto as Exhibit "A".
8. This is the Applicants' Second request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from December 6, 2024 to April 21, 2025.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein and authorizing and directing Debtors to pay said attorneys' fees and expenses. Applicants pray for general relief.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Application for Compensation was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

SABRINA BROWN ERKHART
BRETT ALVIN ERKHART

CASE NO: 24-51518

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 4/23/2025, I did cause a copy of the following documents, described below,

Notice and Application for Compensation

Exhibit A

Exhibit C

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 4/23/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

SABRINA BROWN ERKHART
BRETT ALVIN ERKHART

CASE NO: 24-51518

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 4/23/2025, a copy of the following documents, described below,

Notice and Application for Compensation

Exhibit A

Exhibit C

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 4/23/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 24-51518
SOUTHERN DISTRICT OF MISSISSIPPI
TUE APR 22 13-1-18 PST 2025

~~EXCLUDE~~~~(U)AMERISAVE MORTGAGE CORPORATION~~

FLOWERING PEACH BK LLC
PO BOX 1149
GRAPEVINE TX 76099-1149

~~EXCLUDE~~

SINGING RIVER HEALTH SYSTEM
CO MICHAEL J MCELHANEY JR
P O BOX 1618
PASCAGOULA MS 39568-1618

~~US BANKRUPTCY COURT
DAN M RUSSELL JR US COURTHOUSE
2012 15TH STREET SUITE 244
GULFPORT MS 39501-2036~~

1ST FRANKLIN
1018 INDUSTRIAL PKWY
SARALAND AL 36571-3720

1ST FRANKLIN FINANCIAL CORPORATION
ATTN ADMINISTRATIVE SERVICES
PO BOX 880
TOCCOA GA 30577-0880

AFFIRM INC
650 CALIFORNIA ST
FL 12
SAN FRANCISCO CA 94108-2716

AIDVANTAGE ON BEHALF OF
DEPT OF ED LOAN SERVICES
PO BOX 300001
GREENVILLE TX 75403-3001

ALABAMA CREDIT UNION
ATTN BANKRUPTCY
220 PAUL W BRYANT DR E
TUSCALOOSA AL 35401-2007

(P)DOVENMUEHLE MORTGAGE
1 CORPORATE DRIVE SUITE 360
LAKE ZURICH IL 60047-8945

BIENVILLE ORTHOPAEDIC SPECIALISTS LLC
CO WAKEFIELD ASSOCIATES LLC
PO BOX 58
FORT MORGAN CO 80701-0058

BOLLINGER SHIPYARDS
900 BAYOU CASOTTE PKWY
PASCAGOULA MS 39581-9602

CBA
ATTN BANKRUPTCY
PO BOX 5013
HAYWARD CA 94540-5013

CHIMESTRIDE BANK
ATTN BANKRUPTCY
PO BOX 417
SAN FRANCISCO CA 94104-0417

CITIBANKHOME DEPOT
CITICORP CR SRVSCENTRALIZED BANKRUPTCY
PO BOX 790040
ST LOUIS MO 63179-0040

DLL FINANCE LLC
PO BOX 2000
JOHNSTON IA 50131-0020

DEPARTMENT OF TREASURY
INTERNAL REVENUE SERVICE
PO BOX 7346
PHILADELPHIA PA 19101-7346

~~EXCLUDE~~

~~(D) (P)DOVENMUEHLE MORTGAGE
1 CORPORATE DRIVE SUITE 360
LAKE ZURICH IL 60047-8945~~

EDFINANCIAL SERVICES L
120 N SEVEN OAKS DRIVE
KNOXVILLE TN 37922-2359

FAMILY CHOICE FINANCIAL INC
168 COWART ST
SUITE 2
LUCEDALE MS 39452-5916

~~EXCLUDE~~

~~(D)FLOWERING PEACH BK LLC
PO BOX 1149
GRAPEVINE TX 76099-1149~~

INTERNAL REVENUE SERVI
CO US ATTORNEY
501 EAST COURT ST
STE 4430
JACKSON MS 39201-5025

KOHL'S
PO BOX 3043
MILWAUKEE WI 53201-3043

LVNV FUNDING LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

LVNV FUNDING
ATTN BANKRUPTCY
PO BOX 10497
GREENVILLE SC 29603-0497

MS DEPT OF REVENUE
BANKRUPTCY SECTION PO BOX 22808
JACKSON MS 39225-2808

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

NCB MANAGEMENT SERVICES INC
ATTN BANKRUPTCY
ONE ALLIED DRIVE
TREVISO PA 19053-6945

NATALIE BROWN ESQ
FOR AMERISAVE MORTGAGE CORPORATION
RUBIN LUBLIN LLC
3145 AVALON RIDGE PLACE SUITE 100
PEACHTREE CORNERS GA 30071-1570

NAVIENT
ATTN BANKRUPTCY
PO BOX 9635
WILKES BARRE PA 18773-9635

ONE MAIN FINANCIAL
ATTN BANKRUPTCY
PO BOX 3251
EVANSVILLE IN 47731-3251

ONEMAIN FINANCIAL GROUP LLC
PO BOX 3251
EVANSVILLE IN 47731-3251

(P)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

~~EXCLUDE~~

~~(D) (P)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067~~

RESURGENT RECEIVABLES LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

SINGING RIVER FCU
ATTN BANKRUPTCY
6006 HIGHWAY 63
MOSS POINT MS 39563-9534

~~EXCLUDE~~

~~(D)SINGING RIVER HEALTH SYSTEM
CO MICHAEL J MCELHANEY JR
P O BOX 1618
PASCAGOULA MS 39568-1618~~

SMITH ROUCHON
1456 ELLIS AVE
JACKSON MS 39204-2204

US ATTORNEY GENERAL
US DEPT OF JUSTICE
950 PENNSYLVANIA AVENUE
WASHINGTON DC 20530-0001

US DEPARTMENT OF EDUCATION
EDFINANCIAL SERVICES
120 N SEVEN OAKS DRIVE
KNOXVILLE TN 37922-2359

~~EXCLUDE~~

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6430
JACKSON MS 39201-5022~~

BRETT ALVIN ERKHART
138 ERKHART LN
LUCEDALE MS 39452-4459

DEBTOR

SABRINA BROWN ERKHART
138 ERKHART LN
LUCEDALE MS 39452-4459

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~

(P)WARREN A CUNTZ T1 JR
PO BOX 3749
GULFPORT MS 39505-3749